

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

2014 MAY 21 AM 9:33

DEPUTY CLERK *TDHm*

UNITED STATES OF AMERICA

v.

MARK ANTHONY PAPE (01)

No. 4- 14 CR- 111-Y

INDICTMENT

The Grand Jury Charges:

Count One

Production of Child Pornography
(Violation of 18 U.S.C. §§ 2251(a) and (e))

On or about February 9, 2014, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendant **Mark Anthony Pape** did knowingly employ, use, persuade, and entice a minor, "Jane Doe," to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

Specifically, **Pape** used a Huawei T-Mobile MyTouch cellular phone to create the following visual depiction of a minor engaged in sexually explicit conduct:

File Name	Description
Vid_20140209_214743[1].mp4	A video file in which Pape is engaged in genital/genital, digital/genital, and oral/genital intercourse with a prepubescent female.

In violation of 18 U.S.C. §§ 2251(a) and (e).

Count Two

Penalties for Registered Sex Offenders
(Violation of 18 U.S.C. § 2260A)

On or about February 9, 2014, in the Northern District of Texas and elsewhere, **Mark Anthony Pape**, defendant, being required by state and Federal law to register as a sex offender, did commit a felony offense involving a minor in violation of 18 U.S.C. § 2251, in that he knowingly used a minor to create a visual depiction of the minor engaged in sexually explicit conduct.

In violation of 18 U.S.C. § 2260A.

A TRUE BILL

Angela Beard
FOREPERSON

SARAH R. SALDAÑA
UNITED STATES ATTORNEY

Aisha Saleem
AISHA SALEEM
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FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

THE UNITED STATES OF AMERICA

VS.

MARK ANTHONY PAPE (01)

4- 14 CR- 111- V

INDICTMENT

18 U.S.C. § 2251(a) and (e)

Production of Child Pornography

(1 COUNT)

18 U.S.C. § 2260A

Penalties for Registered Sex Offenders

(1 COUNT)

A true bill rendered:

DALLAS

Brooks Brand

FOREPERSON

Filed in open court this 20th day of May, A.D. 2014.

Defendant in Custody

James C. Campbell, Jr.
UNITED STATES MAGISTRATE JUDGE
(Magistrate Case Number: 4:14-MJ-199)